

EXHIBIT 92
FILED UNDER SEAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

JANE DOE 1, individually and on
behalf of all others similarly
situated,

Plaintiff,

Case No.

-against-

1:22-cv-10019-JSR

JPMORGAN Chase BANK NA,

Defendants.

- - - - - x

C O N F I D E N T I A L

Videotaped oral deposition of
BONNIE PERRY taken pursuant to notice,
was held REMOTELY, commencing May 10,
2023, 9:39 a.m., on the above date,
before Leslie Fagin, a Court Reporter
and Notary Public in the State of New
York.

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1 [REDACTED]

2 [REDACTED] [REDACTED] 10:51:13

3 [REDACTED] 10:51:14

4 [REDACTED] 10:51:14

5 [REDACTED] [REDACTED] 10:51:15

6 [REDACTED] [REDACTED] 10:51:19

7 [REDACTED] 10:51:20

8 [REDACTED] 10:51:20

9 [REDACTED] 10:51:26

10 [REDACTED] [REDACTED] 10:51:28

11 Q. Are you aware of any sex 10:51:31

12 trafficking cases coming out of the private 10:51:33

13 bank during your tenure at JPMorgan? 10:51:35

14 MR. BUTTS: Objection. 10:51:40

15 You may answer. 10:51:42

16 A. No, I don't remember any. 10:51:42

17 Q. I think we spoke about rapid 10:51:45

18 response meetings earlier in your discussion 10:51:49

19 of your responsibilities, is that right? 10:51:52

20 A. That's correct. 10:51:53

21 Q. What is a rapid response meeting? 10:51:54

22 A. So it's an escalation of 10:51:57

23 information that was brought to us, 10:52:01

24 derogatory information, where it seems 10:52:07

25 something that should be escalated up to 10:52:11

1 B Perry

2 management and they just -- we give them the 10:52:13

3 facts, they review it and make a 10:52:20

4 determination on how they want to proceed. 10:52:22

5 Q. So by us, you mean the Americas 10:52:26

6 control group slash -- 10:52:31

7 A. Americas -- 10:52:42

8 MR. BUTTS: So that's I think a 10:52:42

9 good reminder. We are talking over each 10:52:43

10 other a little bit. 10:52:46

11 So can you, Leslie, read the last 10:52:50

12 piece of her answer or the question and 10:52:54

13 then the answer from what you got so 10:52:56

14 far. 10:53:00

15 (Record read.) 10:53:04

16 MR. BUTTS: Maybe Danny, you can 10:53:19

17 take it from the top on that question 10:53:21

18 and we can then answer. 10:53:22

19 Q. By us, you mean the Americas 10:53:23

20 control group/risk management group, right? 10:53:27

21 MR. BUTTS: Objection to form. 10:53:31

22 You may answer. 10:53:32

23 A. Yes. We received it. If I recall, 10:53:33

24 copies may have gone to the banker and their 10:53:39

25 manager, I don't remember. 10:53:42

1 B Perry

2 Q. Was it your understanding that 14:35:00
3 Mr. Epstein was using large cash withdrawals 14:35:08
4 to pay for fuel expenses when he travels to 14:35:11
5 foreign countries? 14:35:13

6 MR. BUTTS: Objection and objection 14:35:15
7 to form. 14:35:15

8 You may answer, if you are able. 14:35:19

9 A. It's probably one of the only 14:35:20
10 things I really remember because of -- fuel 14:35:23
11 expenses for an airplane, I wouldn't even -- 14:35:27
12 I have no idea what it costs, but I thought 14:35:30
13 that was interesting. 14:35:33

14 Q. Okay. I appreciate your answer. 14:35:37
15 Can you just expand upon what you 14:35:38
16 mean by interesting? 14:35:43

17 MR. BUTTS: Objection to form. 14:35:45

18 You may answer. 14:35:46

19 A. I never thought about how much it 14:35:46
20 would cost to fuel an airplane and the answer 14:35:47
21 seemed reasonable. 14:35:51

22 Q. Does it seem reasonable today that 14:35:54
23 Jeffrey Epstein was using 20,000 to \$40,000 14:35:56
24 in cash to pay for fuel expenses? 14:35:59

25 MR. BUTTS: Objection and objection 14:36:03